

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

v.

COLLINS MURPHY, SHARON  
HAMMONDS, BRENDA F. WATKINS,  
LIMESTONE UNIVERSITY, MG  
FREESITES, LTD., d/b/a PORNHUB.COM,  
MG FREESITES II LTD., MINDGEEK  
S.A.R.L., MINDGEEK USA, INC., MG  
BILLING LTD., and HAMMY MEDIA, LTD.  
d/b/a XHAMSTER.COM, TRAFFICSTARS  
LTD., WISEBITS LTD, XHAMSTER IP  
HOLDINGS LTD, WISEBITS IP LTD

Defendants.

Civil Action Number: 7:20-cv-00947-DCC

**DEFENDANTS MINDGEEK, S.A.R.L.,  
MINDGEEK USA, INC., AND MG  
BILLING, LTD'S MOTION TO DISMISS  
PLAINTIFFS' FIFTH AMENDED  
COMPLAINT**

Defendants Mindgeek S.à.r.l., Mindgeek USA, Inc., and MG Billing, Ltd (collectively the “Moving Defendants”)<sup>1</sup> moves this Court, pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure and Rule 7.01, Local Civil Rules, for an order granting dismissal with prejudice and without leave to amend on each and every allegation, cause of action, and or prayer for damages or relief contained in Plaintiffs’ Fifth Amended Complaint, (Dkt. 193).

In support of this Motion, the Moving Defendants state that: (1) they are not subject to the personal jurisdiction of this Court, and (2) Plaintiffs have failed to state a claim upon which relief may be granted.

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<sup>1</sup> Plaintiffs have also added MG Freesites II, Ltd as a Defendant in this action. MG Freesites II, Ltd is a non-existent entity that cannot sue or be sued, and therefore, cannot be subject to this jurisdiction of this Court.

On these grounds and as set forth in the supporting memorandum, the Moving Defendants respectfully requests this Court dismiss the action in its entirety and with prejudice and without leave to amend.

A certificate of consultation under Rule 7.02, Local Civil Rules, is not provided as not required by subsection (A) of the same rule relative to motions to dismiss. Local Civ. Rule 7.02(A) D.S.C.

Respectfully submitted,

DATED November 14, 2022

Columbia, South Carolina

TURNER, PADGET, GRAHAM AND LANEY,  
P.A.

By: /s/ Mark Goddard

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